

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of  
  
Numbering Resource Optimization

CC Docket No. 99-200

**REPLY OF VERIZON**

The most important thing for the Commission to do at this point is to promptly adopt a number pooling rollout plan and then to stick to it. Implementation for the first quarter of the Commission's schedule must begin soon, and the Commission must finalize that schedule immediately if that timetable is going to be met. Once the Commission adopts a schedule, it should not consider requests for additional modifications, unless those requests are based on unforeseen circumstances that make adherence to the approved schedule impossible or unduly burdensome.<sup>1</sup>

Verizon supported the plan proposed by the Commission in the Public Notice (with the clarifications suggested in our original comments) even though that plan was inconsistent with the Commission's own limit of three NPAs per region per quarter. This support was based on the proviso that "the Commission does not add any additional NPAs later."<sup>2</sup> Some commentators have asked that the Commission change this schedule by reordering NPAs in a way that does not increase the number in any quarter. Verizon does not object to such modifications. Verizon is concerned, however, about requests that ask only to move NPAs up in the schedule with no

---

<sup>1</sup> Verizon, therefore, disagrees with Vermont's apparent understanding that the Commission is "allowing states to substitute alternative NPAs for those already included in the schedule." Vermont at 2.

<sup>2</sup> Verizon at 2.

corresponding deferrals. Some of these requests add NPAs to quarters that already are scheduled for more than three NPAs. The Commission should advance an NPA only to fill a slot that has been opened up by an NPA that is being delayed.

In its comments, Verizon said that it understood the Commission’s proposal to require that number pools be established throughout an NPA, not merely in the rate centers that are within one of the top 100 MSAs.<sup>3</sup> Other commentators share this understanding. For example, “the Texas Commission understands that thousands-block pooling will be implemented in the entire NPA, as listed in the schedule, and not just in the rate centers in that NPA that are within the geographic boundaries of the associated MSA.”<sup>4</sup> Similarly, “SBC recommends that the entire NPA be pooled.”<sup>5</sup> Only BellSouth seems to disagree,<sup>6</sup> but its comments do not dispute SBC’s observations that “it would be more efficient to implement the entire NPA at once rather than having to come back at some future date to move the remaining rate centers within that NPA to” pooling and that “the administration of numbering resources will be easier if the entire NPA is pooled, because it would provide a consistent process for TN Administration.”<sup>7</sup> The Commission should follow the lead of virtually all the states that have implemented pooling in Verizon’s experience and include the entire NPA in the area to be pooled.

Other commentators also agree with Verizon that it would be preferable to allow the industry to work out detailed schedules on an NPA-by-NPA basis, as it has been doing for many months. For example, Vermont urges “the FCC should allow the industry flexibility, to the

---

<sup>3</sup> Verizon at 4.

<sup>4</sup> Texas at 2.

<sup>5</sup> SBC at 2.

<sup>6</sup> BellSouth at 11.

<sup>7</sup> SBC at 9.

extent that this does not interfere with other states' pooling efforts, to modify the accelerated pooling rollout schedule if necessary,"<sup>8</sup> while "CBT questions the need for the Commission to set any specific dates other than the date of the first implementation meeting and the pool start date."<sup>9</sup>

Verizon, therefore, requests that the Commission quickly issue a final schedule incorporating the modifications and clarifications suggested in Verizon's comments so that the industry can begin the national rollout of number pooling and then that it not change that schedule, except in the face of extraordinary circumstances.

Respectfully submitted,

/S/

---

John M. Goodman

Attorney for the Verizon  
telephone companies

1300 I Street, N.W.  
Washington, D.C. 20005  
(202) 515-2563

Michael E. Glover  
Edward Shakin  
Of Counsel

Dated: November 16, 2001

---

<sup>8</sup> Vermont at 2.

<sup>9</sup> CBT at 6. Similarly, BellSouth at 6 ("The Pooling Administrator and the industry should develop the milestones, not the Commission").